REMARKS

This response responds to the Office Action dated April 14, 2005 in which the Examiner rejected claims 1-35 under 35 U.S.C. §103.

Claims 1-35 were rejected under 35 U.S.C. §103 as being unpatentable over *Daniels, Jr. et al.* (U.S. Patent No. 6,343,327) in view of *McCauley et al.* (U.S. Patent No. 6,434,578).

Applicant respectfully traverses the Examiner's rejection of the claims under 35 U.S.C. §103. The claims have been reviewed in light of the Office Action, and for reasons which will be set forth below, Applicant respectfully requests the Examiner withdraws the rejection to the claims and allows the claims to issue.

Daniels, Jr. et al. appears to disclose mass mail delivery mechanisms and, more particularly, to combined electronic and physical delivery mechanisms. (col. 1, lines 5-7) FIG. 1 depicts a printstream delivery architecture according to an embodiment of the present invention. A user at a sender's mainframe 100 submits to printstream processor 102 documents in a printstream, addressing information in the form of delivery preferences stored in a database, and control information specifying, e.g., what inserts are to be included with each document in the printstream. (col. 3, lines 25-31) The printstream processor 102 utilizes a customer database 202 of delivery preferences that indicate how each document for each recipient is to be delivered, e.g. physically, by fax, etc. Control information 204 is also input to printstream processor 102 to specify processing instructions, for example, which inserts are to be included and whether to presort the documents. Printstream processor 102 separates the raw printstream into two printstreams, one for physical delivery and another for electronic delivery. Physical delivery printstream 210 is sent

to printer 104 for the next step in the physical delivery process. The other printstream

is electronic delivery printstream 224 comprising the remaining 40,000 documents of

the raw printstream 200. Electronic delivery printstream 224 is sent to electronic

inserter 110 for the next step in the electronic delivery process. Printstream

processor 102 also produces two datafiles, mail run datafile 220 and electronic mail

run datafile 222. (col. 4, lines 45-66) As depicted in FIG. 4, electronic inserter 110

splits the electronic delivery printstream 224 into individual electronic mail pieces and

packages them with an insert appropriate for the electronic delivery mechanism

specified for the electronic mail pieces. (col. 5, lines 48-52) Inserts for each batch of

mail are defined by a job setup. Accordingly, the job setup for this batch of mail, e.g.

job setup file 402, contains a set of templates and inserts for each delivery

mechanism. (col. 5, line 66 through col. 6, line 9) Referring to FIG. 5, job setups

may be defined by a job setup process 520 (not shown in FIG. 1). The job setup

process is an interactive application that allows a user to select templates and

inserts for each delivery mechanism from a library. For example, electronic mail

library 500 includes templates for formatting electronic mail messages. Fax library

502 may include templates and inserts as text files and text attachments to be sent

along with a fax. Web library 504 includes the inserts in the form of URLs (web page

addresses), PDF (Postscript Display Format, a portable display standard), or HTML

(Hyper-Text Markup Language) files, which are common on the World Wide Web.

Thus, the job setup process 520 prompts the user for templates, HTML files, text

attachments, e.g. through a dialog box or a form for each electronic delivery

mechanism. The job setup process 520 records and enables editing of the user's

selections of templates and inserts for each electronic delivery mechanism. The

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output of the job setup process 520 is a job setup file, e.g. job setup file 402 and job setup file 518. (col. 6, lines 29-48) If the electronic mail piece is not delivered after a certain length of time, the message router 112 generates and sends a "failed to process" or "failed to deliver" message to status/regeneration processor 118, which (depending on the users configured system, which system is configurable) may cause a physical version of the undelivered electronic mail piece to be produced by printer 104 and physical inserter 106 and delivery by physical means. (col. 4, lines 26-33)

Thus, *Daniels, Jr. et al.* merely discloses that a job setup process is an interactive application that allows a user to select templates and inserts for each delivery mechanism from a library (col. 6, lines 29-32). Thus nothing in *Daniels, Jr. et al.* shows, teaches or suggests selecting a single priorly stored filed of presentation instructions valid for a plurality of messages as claimed in claims 1, 4-5, 19 and 22-23. Rather, *Daniels, Jr. et al.* teaches away from the claimed invention since the job setup process is an interactive application in which a user has to select templates and inserts for each delivery mechanism. In other words, since the job setup process is an interactive application, it inherently teaches away from the claimed invention of selecting a single priorly stored file of presentation instructions. Furthermore, since the user has to select templates and inserts for each delivery mechanism, *Daniels, Jr. et al.* inherently teaches away from the claimed invention of selecting a priorly stored file which is valid for a plurality of messages. In other words, since the user must select templates and insert for each delivery mechanism, the job set up process must be repeated for each form of delivery. However, as

claimed in claims 1, 4, 5, 19, 22 and 23, a single priorly stored file of presentation

instructions is valid for a plurality of messages.

Additionally, *Daniels, Jr. et al.* merely discloses the job setup process 520

prompts a user for templates, HTML files, text attachments through a dialog box or a

form for each electronic delivery mechanism. (Col. 6, lines 40-43). Nothing in

Daniels, Jr. et al. shows, teaches or suggests activating a send dialogue program

and selecting a file of presentation instructions by selecting a symbol as claimed in

claims 4 and 22. Rather, *Daniels, Jr. et al.* merely discloses a job setup process 520

which prompts a user for information.

Finally, *Daniels, Jr. et al.* merely discloses that electronic mail piece which is

not delivered after a certain length of time causes a message router 112 to generate

and send a failed to deliver message (col. 4, lines 26-34). Nothing in *Daniels, Jr.*

et al. shows, teaches or suggests a) selecting a presentation instruction under a

particular user authorization and b) editing the file of presentation instructions under

a different authorization as claimed in claims 5 and 23. Rather, *Daniels, Jr. et al.*

merely discloses delivering a message when electronic mail is not delivered.

McCauley et al. appears to disclose methods and systems for authoring and

rendering hypermedia content in conjunction with client devices such as Internet

browsers. (col. 1, lines 6-8) "Hypermedia" is a metaphor for presenting information

in which text, images, sounds, and actions become linked together in a complex,

non-sequential web of associations that permit a user to browse through related

topics, regardless of the presented order of the topics. (col. 1, lines 12-16)

Hypermedia content is commonly organized as documents or files with embedded

control information. The embedded control information includes formatting

specifications, indicating how a document is to be rendered by the Web browser. In addition, such control information can include links or "hyperlinks": symbols or instructions telling the Web browser where to find other related WWW documents on the Internet. (col. 1, lines 25-32) Authoring multimedia content in a generic format is not specific to the features of any particular client browser. When a client requests an information page, a server reads a page specification and converts it into a format that is tailored specifically for the requesting client. The information page is converted into a format that utilizes advanced features of the client's browser and that also efficiently utilizes the resources available to the client. (col. 2, lines 39-46) FIG. 2 illustrates general methodical steps performed by server system 12, or more specifically by server application program 17. Server program 17 implements a method of rendering information pages based on page specifications. The rendering is accomplished by emitting or formulating an instruction sequence and sending it to a client device. The instruction sequence is interpreted by the client viewer running on client device 14 to render the information page. (col. 4, lines 53-60) A first step 30 comprises determining characteristics of the client, including such things as which viewer or browser the client is using, display characteristics of the client device, and communication characteristics associated with the connection to the client device. (col. 5, lines 1-5) A subsequent step 32 comprises converting the page specification corresponding to the requested information page to an actual instruction stream that is optimized for the requesting client. (col. 5, lines 14-17) A final step 34 comprises providing or sending the instruction stream to the client to render the information page in conjunction with the client viewer, using the commands and features of the client viewer. (col. 5, lines 57-60) FIG. 3 shows elements of server application

program 17 that are used to render information pages in accordance with the specific characteristics of clients. These elements include a dispatcher 40 and a plurality of page renderers 42. Each page renderer is an independently-executable program module or object. (col. 5, line 63 through col. 6, line 1) Every page renderer reads and uses a page specification to decide how to render an information page. An individual information page has only a single page specification, which is used by any page renderer attempting to render the information page. Each page specification includes pane specifications for individual panes within the information page. A pane, as used herein, is an individual portion, area, or sub-division of an information page. A page is made up of one or more panes, and all page information is presented within one of such panes. (col. 6, lines 30-39)

Thus, *McCauley et al.* is merely directed to providing web pages for a variety of browsers. Nothing in *McCauley et al.* shows, teaches or suggests selecting a single priorly stored file of presentation instructions valid for a plurality of messages as claimed in claims 1, 4, 5, 19, 22 and 23. Rather, *McCauley* is merely directed to providing hypermedia content in conjunction with client devices such as internet browsers. In fact, the problem solved by *McCauley et al.* is a problem of defining the desired appearance and way of processing a message and only involves the elaboration of the data for rendering messages of a particular type.

Additionally, nothing in *McCauley* shows, teaches or suggests selecting a file of presentation instructions by selecting a symbol as claimed in claims 4 and 22 or selecting the presentation instructions under a particular user authorization and editing the file of presentation instructions under a different authorization as claimed in claims 5 and 23.

A combination of *Daniels, Jr. et al.* and *McCauley et al.* would merely suggest

to use the system of *Daniel, Jr. et al.* and when a web page is the desired way to

deliver information in *Daniel, Jr. et al.*, then applying *McCauley et al.* to the templates

used for the generation of the messages on the basis of the printstream. Thus

nothing in the combination of *Daniels, Jr. et al.* and *McCauley et al.* shows, teaches

or suggests selecting a single priorly stored file of presentations and instructions

valid for a plurality of messages as claimed in claims 1, 4-5, 19 and 22-23.

Additionally, nothing in the combination of the references shows, teaches or

suggests the other discussed features as claimed in claims 4-5 and 22-23.

Therefore, Applicants respectfully request the Examiner withdraws the rejection to

claims 1, 4-5, 19 and 22-23 under 35 U.S.C. §103.

Claims 2-3, 6-18, 20-21 and 24-35 depend from the independent claims and

recite additional features. Applicant respectfully submits that claims 2-3, 6-18, 20-21

and 24-35 would not have been obvious within the meaning of 35 U.S.C. §103 over

Daniels, Jr. et al. and *McCauley et al.* at least for the reasons as set forth above.

Therefore, Applicant respectfully requests the Examiner withdraws the rejection to

claims 2-3, 6-18, 20-21 and 24-35 under 35 U.S.C. §103.

The prior art of record, which is not relied upon, is acknowledge. The

references taken singularly or in combination do not anticipate or make obvious the

claimed invention.

Thus it now appears that the application is in condition for reconsideration and

allowance. Reconsideration and allowance at an early date are respectfully

requested. Should the Examiner find that the application is not now in condition for

allowance, Applicant respectfully requests the Examiner enters this response for purposes of appeal.
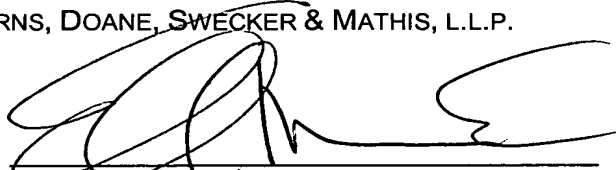
In the event that this paper is not timely filed within the currently set shortened statutory period, Applicant respectfully petitions for an appropriate extension of time. The fees for such extension of time may be charged to our Deposit Account No. 02-4800.

In the event that any additional fees are due with this paper, please charge our Deposit Account No. 02-4800.

Respectfully submitted,

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